

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff

v.

- 1) \$997,986.00 in United States currency;
 - 2) \$26,603.00 in United States currency;
 - 3) \$101.00 in United States currency;
 - 4) 21 items to include 4 pairs of
sunglasses and 17 bags and purses;
- Defendants *in Rem*.**

CIVIL NO. 24-

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

TYO THE HONORABLE COURT:

COMES Now, the United States of America and brings this Verified Complaint for Forfeiture *In Rem* under Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action *in rem* brought pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6), seeking forfeiture of: (1) any property, real or personal,

which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity” (as defined in section [18 U.S.C. § 1956(c)(7)]), that is, a the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance or listed chemical (as defined in section 102 of the Controlled Substances Act), punishable under any law of the United States, or a conspiracy to commit such offense; and (2) all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. § 801, *et seq.*, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of 21 U.S.C. § 801, *et seq.*

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 18 U.S.C. § 981 (a)(1)(C), and 21 U.S.C. § 881(a)(6).
3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendant pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

THE DEFENDANTS *IN REM*

4. The Defendants *in Rem* are:

- a). \$997,986.00 in United States currency seized on or about May 16, 2024, from a 2006 Chevrolet Colorado at Urbanization Praderas de Navarro, DD4 Zafiro Street, Gurabo, Puerto Rico.
- b). \$26,603.00 in United States currency seized on or about May 16, 2024, from the residence at Urbanization Praderas de Navarro, DD4 Zafiro Street, Gurabo, Puerto Rico.
- c). \$101.00 in United States currency seized on or before May 16, 2024, from within a 2012 Ford F-150 at Urbanizatón Praderas de Navarro, DD4 Zafiro Street, Gurabo, Puerto Rico.
- d). 21 items to include 4 pairs of sunglasses and 17 bags and purses seized on May 16, 2024, from the residence at Urbanization Praderas de Navarro, DD4 Zafiro Street, Gurabo, Puerto Rico. Items are described below:

1. Black & Blue Luis Vuitton Sunglasses



2. Black & Gold Luis Vuitton Sunglasses



3. Black & Gold Luis Vuitton Sunglasses



4. Black & Gold Luis Vuitton Sunglasses



5. Black Checkers Board Luis Vuitton Bag



6. Small Brown Gucci Bag with Gold Accents



7. Blue Chanel Purse



8. White Chanel Purse



9. Small Black Chanel Purse



10. Black Louis Vuitton Satchel



11. Black Leather Louis Vuitton Satchel



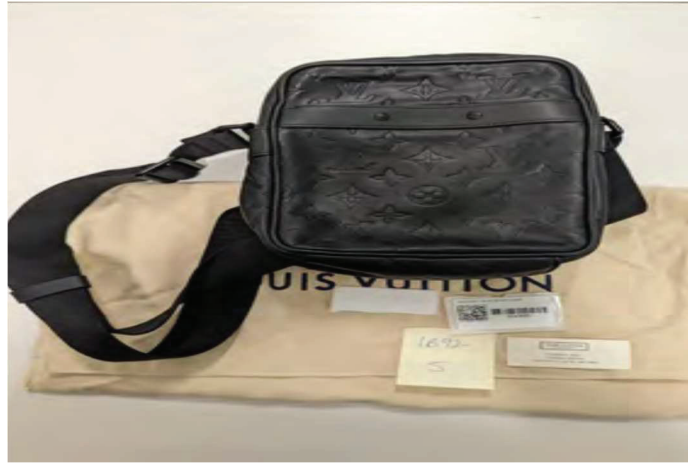
12. Black Checkerboard Louis Vuitton Bag



13. Black Leather Louis Vuitton Toiletry Bag



14. Black Leather Louis Vuitton Bag



15. Black Leather Louis Vuitton Bag with Gold Accents



16. Black & Blue Checkboard Louis Vuitton Bag



17. Black & Blue Checkerboard Louis Vuitton Bag



18. Red Dior Purse



19. Gray Chanel Purse with Silver Accents



20. Gray Chanel Purse



21. Red Chanel Purse



5. The Defendants *in Rem* are within the possession, custody, or control of the United States.

FACTS

6. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent Chelsea B. Nuciforo of the Federal Bureau of Investigation.

CLAIM FOR RELIEF

The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendants *in Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendants *in Rem* condemned and forfeited to the United States of America for disposition according to law and that the Court grant the United

States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of November 2024.

W. STEPHEN MULDROW
United States Attorney

/s/Myriam Y. Fernández-González
Myriam Y. Fernández-González
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DECLARATION

I, Myriam Y. Fernández-González, Assistant U.S. Attorney, for the District of Puerto Rico, declare under penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the United States Federal Bureau of Investigation (FBI); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 13th day of November 2024.

/s/Myriam Y. Fernández-González
Myriam Y. Fernández-González
Assistant United States Attorney – 218011

VERIFICATION

I, Chelsea B. Nuciforo, depose and say that I am a Special Agent with the Federal Bureau of Investigation and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 13th day of November 2024.

CHELSEA
NUCIFORO

Digitally signed by
CHELSEA NUCIFORO
Date: 2024.11.12
14:11:59 -05'00'

Chelsea B. Nuciforo, Special Agent
Federal Bureau of Investigation (FBI)